

FILED

March 13, 2024

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: DT
Deputy

UNITED STATES OF AMERICA,

Plaintiff,

v.

ADRIAN ZANABRIA,

Defendant.

Case No: EP:24-CR-00559-DCG

INDICTMENT

CT 1: 8 U.S.C. §§ 1324(a)(1)(A)(v)(I),
(a)(1)(A)(ii) and (a)(1)(B)(i) - Conspiracy to
Transport an Alien;

CT 2: 8 U.S.C. §§ 1324(a)(1)(A)(ii) and
(a)(1)(B)(i) - Transporting an Alien

THE GRAND JURY CHARGES:

COUNT ONE

(8 U.S.C. §§ 1324(a)(1)(A)(v)(I), (a)(1)(A)(ii) and (a)(1)(B)(i))

On or about February 14, 2024, in the Western District of Texas, Defendant,

ADRIAN ZANABRIA,

knowingly, intentionally, and unlawfully conspired, combined, and confederated, and agreed with others known and unknown to the Grand Jury, to commit an offense against the United States, namely: to transport and move and attempt to transport and move an alien within the United States knowing and in reckless disregard of the fact that said alien had come to, entered, and remained in the United States in violation of law, said transportation being in furtherance of said violation of law, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), (a)(1)(A)(ii) and (a)(1)(B)(i).

COUNT TWO

(8 U.S.C. §§ 1324(a)(1)(A)(ii) and (a)(1)(B)(i))

On or about February 14, 2024, in the Western District of Texas, Defendant,

ADRIAN ZANABRIA,

knowing and in reckless disregard of the fact that an alien had come to, entered and remained in the United States in violation of law, transported and moved, and attempted to transport and move such alien within the United States in furtherance of said violation of law, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (a)(1)(B)(i).

A TRUE BILL.

FOREPERSON OF THE GRAND JURY

JAIME ESPARZA
UNITED STATES ATTORNEY

BY: *José Luis González*
Assistant U.S. Attorney